

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

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LULAC, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, in his official capacity as  
Governor of Texas, *et al.*,

*Defendants.*

Case No.: 3:21-CV-00259-DCG-JES-JVB  
[Lead Case]

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ROY CHARLES BROOKS, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, in his official capacity as  
Governor of Texas, *et al.*,

*Defendants.*

Case No.1-21-CV-00991-DCG-JES-JVB  
[Consolidated Case]

***BROOKS* PLAINTIFFS' MOTION TO ENLARGE PAGE LIMITS**

The *Brooks* Plaintiffs' reply in support of their motion for a preliminary injunction is due today, December 23, 2021. Under Local Rule CV-7(e)(3), *Brooks* Plaintiffs' Reply would ordinarily be limited to ten (10) pages. *Brooks* Plaintiffs respectfully seek leave to file a reply brief that does not exceed 30 pages. There is good cause for the requested enlargement of the page limits in light of the serious nature and complexity of both *Brooks* Plaintiffs' claim for intentional racial discrimination and their claim that race was the predominant districting criterion with respect to SD10. Further, an enlargement of the page limit is necessary respond to Defendants' opposition to Plaintiffs' Motion, which runs 50 pages, and to provide the Court with a comprehensive analysis of Plaintiffs' legal theory, the preliminary injunction factors, and the factual evidence rebutting

Defendants' opposition. Counsel for Plaintiffs contacted counsel for Defendants, but received a notification that the Attorney General's office is closed for the holiday.

For the foregoing reasons, *Brooks* Plaintiffs respectfully request leave for an enlargement of the page limit to 30 pages.

December 23, 2021

Respectfully submitted,

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*Counsel for Brooks Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that all counsel of record were served a copy of the foregoing this 23rd day of December, 2021, via the Court's CM/ECF system.

/s/ Mark P. Gaber  
Mark P. Gaber